



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

AUG 07 2009

Ms. Karen Bassett
Chair, ECOS Data Management Work Group
Deputy Director
Arkansas Department of Environmental Quality
5302 Northshore Drive
Little Rock, AR 72118-5317

Dear Ms. Bassett:

On behalf of Administrator Jackson, we would like to thank the Environmental Council of the States (ECOS) and their representatives for working with us on improving our technical approach for completing the Permit Compliance System (PCS) modernization.

As you know, per your May 29 and July 29, 2009 letters to the Administrator, EPA in collaboration with ECOS, convened a workgroup with participation from nine states, ECOS, and EPA (Office of Enforcement and Compliance Assurance (OECA) and the Office of Environmental Information (OEI)) to gather additional information regarding the technical challenges and potential cost impacts posed by the various technical alternatives for development of the "full batch" component of ICIS-NPDES. Based on the workgroup effort, we identified a better approach (called Alternative 1A). While this new alternative is more expensive for EPA, we believe the additional cost is well justified by creating a more robust alternative that should meet the needs of almost all the states and allows us to move forward to implementation. We appreciate the time and effort by the states in helping us to develop this better alternative.

We agree with the suggestions in your July 29, 2009 letter. EPA will continue to work with the Exchange Network Governance Structure to follow the Exchange Network policies and standards. EPA will also work with the Exchange Network to convene an ICIS-NPDES Full Batch Integrated Project Team (IPT) to assist in the design of the ICIS full batch exchange. (We previously used such an IPT for the batch DMR flow to ICIS-NPDES.) This IPT will ensure that the ICIS full batch design, per Alternative 1A, functions as efficiently as possible. In addition, at the earliest possible stage of the Air Facility System (AFS) modernization effort, we will convene an IPT to engage stakeholders in discussion on the data exchange design for the modernized AFS.

Further, EPA is committed to continuing to working with the states to implement Alternative 1A by providing technical assistance and/or by identifying grant opportunities that will support the flow of NPDES data from state systems to ICIS-NPDES. We appreciate your and your members continued support as we proceed to move the remaining states from PCS to ICIS-NPDES. We look forward to working with you to promote open, collaborative and transparent implementation of the nation's environmental protection laws.

Sincerely,



Cynthia Giles
Assistant Administrator
Office of Enforcement and Compliance Assurance



Linda Travers
Acting Assistant Administrator
Office of Environmental Information

cc: Steve Brown, ECOS Executive Director